

# Exhibit A

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United States District Court  
District of Rhode Island

Jason Boudreau  
Plaintiff

v.

Central Falls Detention Case No. 1:20-CV-00324-JJM-LDA  
Facility Corp., et al.  
Defendants

Plaintiff's First Request for the Production  
of Documents to Defendant Caniglia

Plaintiff, Jason Boudreau, hereby requests that Defendant Crystal Caniglia produce the following documents within 30 days in accordance with Fed. R. Civ. P. 34.

Definitions

"ESI" means all electronically stored information including emails, Offender Management System entries and reports, Word documents and Excel documents.

## Requests

Request No. 1: All kiosk request messages sent to Program Services from any A-dorm detainees from January 1, 2019 to November 21, 2019 that pertain to a request for a job.

Request No. 2: All kiosk request messages sent to Program Services from any protective custody detainees from January 1, 2018 to December 31, 2018 that pertain to a request for a job.

Request No. 3: All documents, ESI, policies, and/or procedures regarding the retention of kiosk request messages sent by detainees to Wyatt Staff.

Request No. 4: All documents and ESI pertaining to any emails sent or received by the Defendant that pertain to the confiscation, search, and/or withholding of Plaintiff's digital legal materials from December 3, 2019 to January 31, 2020.

Request No. 5: All A-dorm detainee kiosk messages that pertain to any bathroom and/or water access from December 15, 2018 to November 18, 2019.

Request No. 6: A copy of the Plaintiff's X-ray and/or radiograph that depicts an image of Plaintiff's ankle fracture that was taken on September 5, 2017, September 6, 2017, and September 8, 2017.

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Request No. 7: All documents that pertain to the Wyatt Facility's purchase of a TED Stacking for Plaintiff in September 2017.

Request No. 8: All incident reports that pertain to Plaintiff's injury to his ankle in August 2017.

Request No. 9: All documents that pertain to any policies and/or procedures that pertain to the Criteria For creating an incident report regarding detainee injuries.

Request No. 10: All documents and ESI regarding grievances filed against the Defendant in 2018 that pertain to retaliation and/or misconduct in any way.

Request No. 11: All emails that pertain to the Plaintiff that Defendants either sent or received from November 20, 2019 to January 31, 2020.

Request No. 12: All complaints against the Defendant by any detainees using the Request Manager kiosk system from January 1, 2019 to December 31, 2019.

Request No. 13: All documents and ESI that pertain to the Defendant's actions regarding the Plaintiff on November 21, 2019 and December 11, 2019.

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Request No. 14: All complaints against the Defendant by any detainees using the Request Manager kiosk system from January 1, 2018 to December 31, 2018 that pertain to any retaliation and/or misconduct.

Request No. 15: All documents and ESI that pertain to any policies and/or procedures for creating a log report in the Offender Management System.

Request No. 16: All documents and ESI that pertain to any policies and/or procedures for creating entries in Defendant Caniglia's log report.

Request No. 17: A copy of all entries in the Offender Management System entered by Defendant Caniglia on November 20, 2019, November 21, 2019, November 22, 2019, and December 11, 2019 that pertain to the Plaintiff.

Request No. 18: All documents and ESI related to ~~your~~ the Decision to give Plaintiff his job back in December 2019.

Request No. 19: All documents and ESI related to your decision to remove Plaintiff from his unit worker position on December 11, 2019.

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Request No. 20: All documents and ESI related to any policies and/or procedures related to the retention of Detainee Request Manager (kiosk) messages submitted by detainees.

Request No. 21: All documents and ESI pertaining to Policies and/or procedures in using the Wyatt Request Manager (kiosk) system by Wyatt staff, including procedures for searching for information in that system.

Request No. 22: A copy of all of Plaintiff's Wyatt Request Manager (kiosk) system messages that were sent to Defendant Martin, Chief of Support Services, Chief of Security, Program Services, Programs Director, and the U.S. Marshal from November 19, 2019 to April 5, 2021.

Request No. 23: All documents and ESI that demonstrate when Sgt. Cate was in A-dorm on November 20, 2019.

Request No. 24: All documents and ESI related to the criteria for suspending and/or terminating a detainee from a unit post worker job that was in effect in 2019.

Request No. 25: A copy of all internal memor regarding the Plaintiff from November 20, 2019 to December 31, 2019.

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Request No. 26: A copy of all internal memos regarding the Plaintiff from January 1, 2020 to December 31, 2020.

Request No. 27: A copy of all internal memos regarding the Plaintiff from January 1, 2021 to April 30, 2021.

Request No. 28: All documents filed with the Court by the Defendant from April 1, 2021 to present, that pertain to the Plaintiff, that Defendant filed in *Grossman v. Martin, et al*, Case No. 1:20-cv-00048-JJM-LDA

Request No. 29: All documents filed with the Court in *Grossman v. Martin, et al*, case 1:20-cv-00048-JJM-LDA, by the Defendant that mentions the Plaintiff by name, from April 1, 2021 to present.

Request No. 30: All documents and ESI that pertain to the Plaintiff's transfer from the Wyatt Facility on April 5, 2021.

Request No. 31: All documents and ESI that depict which A-dorm detainees were pod workers on November 21, 2019.

Request No. 32: All documents, ESI, and screenshot images that depict the information in the "incidents" tab in the Offender Management System in Plaintiff's Offender Management System File.



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Request No. 33: All documents, ESI, and screenshot images that depict the information in the "grievances" tab in the Offender Management System File for Plaintiff. (See Bates WB0000397)

Request No. 34: All documents, ESI, and screenshot images that depict the information in the "Housing" tab in the Offender Management System File for Plaintiff. (See Bates WB0000397)

Request No. 35: All documents, ESI, and screenshot images that depict the information in the "medical" tab in the Offender Management System File for Plaintiff. (See Bates WB0000397)

Request No. 36: All documents, ESI, and screenshot images that depict the information in the "med visits" tab in the Offender Management System File for Plaintiff. (See Bates WB0000397)

Request No. 37: All documents, ESI, and screenshot images that depict the information in the "Misconducts" tab in the Offender Management System File for Plaintiff. (See Bates WB0000399)

Request No. 38: All documents, ESI, and screenshot images that depict the information in the "mail log" tab in the Offender Management System File for Plaintiff. (See Bates WB0000399)

Request No. 39: All documents, ESI, and screenshot images that depict the information in the "Questionnaire" tab in the Offender Management System File for Plaintiff. (See Bates WB0000410)



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Request No. 40: All documents, ESI, and screenshot images that depict the information in the "employment" tab in the Offender Management System File for Plaintiff.

Request No. 41: All documents, ESI, and screenshot images that depict the information in the "education" tab in the Offender Management System File for Plaintiff.

Request No. 42: All documents, ESI, and screenshot images that depict the available tab selections available in the Offender Management System File for Plaintiff.

Request No. 43: All microsoft excel files that pertain to the Plaintiff that were created and/or edited from January 1, 2018 to April 5, 2021.

Request No. 44: All microsoft Word files that pertain to the Plaintiff that were created and/or edited from January 1, 2018 to April 5, 2021.

Request No. 45: All emails sent or received by any Wyatt employee that pertain to the Plaintiff from November 20, 2019 to April 5, 2021.

Request No. 46: All emails sent or received by any Wyatt employee that mentions the Plaintiff by name, from November 20, 2019 to April 5, 2021.

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Request No. 47: All emails sent or received by any Wyatt Medical Staff that pertains to the Plaintiff From August 27, 2017 to September 30, 2017

Dated: May 24, 2021

Submitted by,



Jason Bowdreau

#79376

Plymouth County Correctional Facility

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